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Attorneys for Plaintiff
THAT ONE VIDEO ENTERTAINMENT, LLC, a
California limited liability company

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

THAT ONE VIDEO
ENTERTAINMENT, LLC, a
California limited liability company,

Plaintiff,
vs.

KOIL CONTENT CREATION PTY
LTD., an Australian proprietary
limited company doing business as
NOPIXEL; MITCHELLE CLOUT,
an individual; and DOES 1-25,
inclusive,

Defendants.

CASE NO: 2:23-cv-02687 SVW (JCx)

[Assigned to the Hon. Stephen V. Wilson;
Ctrm 10A]

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO QUASH,
OR, IN THE ALTERNATIVE, FOR A
PROTECTIVE ORDER**

Hearing:

Judge: Hon. Jacqueline Chooljian

Date: September 10, 2024

Time: 9:30 a.m.

Place: Ctrm 750, 255 East Temple Street,
Los Angeles, California, 90012

Action Filed: April 10, 2023

Trial Date: September 17, 2024

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO QUASH, OR,
IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER**

[PROPOSED] ORDER

On September 10, 2024 at 9:30 a.m. in Courtroom 750 of the above-entitled Court, located at 255 East Temple Street, Los Angeles, California, 90012, the Honorable Jacqueline Chooljian presiding, the filed by Plaintiff THAT ONE VIDEO ENTERTAINMENT, LLC a California limited liability company (“TOVE” or “Plaintiff”) motion for an order quashing the Subpoena served upon TOVE’s immigration attorneys on or about July 18, 2024 by Defendants KOIL CONTENT CREATION PTY LTD., an Australian proprietary limited company doing business as NOPIXEL, and MITCHELL CLOUT, an individual (collectively, “Defendants”), or, in the alternative, for an order preventing Defendants from obtaining any attorney-client privileged documents sought from such Subpoena (collectively, the “Motion”), came on regularly for hearing.

Having read and considered the Motion, the papers in support of and in opposition to the same, as well as the oral arguments of the parties and papers on file in the action, and finding good cause therefore, the Court hereby **GRANTS** the Motion.

IT IS SO ORDERED.

DATED: _____

By: _____

Hon. Jacqueline Chooljian
UNITED STATES DISTRICT
COURT MAGISTRATE JUDGE

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 9454 Wilshire Blvd, Suite 825, Beverly Hills, CA 90212.

On August 8, 2024, I served the documents described as:

PLAINTIFF'S MOTION TO QUASH, OR, IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF JOHN BEGAKIS IN SUPPORT THEREOF

DECLARATION OF BENJAMIN LAU IN SUPPORT OF PLAINTIFF'S MOTION TO QUASH, OR, IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER

DECLARATION OF DANIEL TRACEY IN SUPPORT OF PLAINTIFF'S MOTION TO QUASH, OR, IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO QUASH, OR, IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER

on all interested parties in this action by placing _____ the original X a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Larry Zerner, Esq.
MORRISON COOPER LLP
10900 Wilshire Blvd., Suite 930
Los Angeles, CA 90024
larry@morrisoncooper.com
Keith@morrisoncooper.com
Kat@morrisoncooper.com

[X]: BY ELECTRONIC MAIL:

As follows: I hereby certify that I served the above-described document on the interested parties in this action by attaching an electronic copy of the document to an email addressed to the parties listed below at their most recent e-mail address of record in this action. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X]: (FEDERAL) – I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on August 8, 2024, in Los Angeles, California.


John Begakis

PROOF OF SERVICE